FEB 07 1991

Mr. Edgar G. Kaup, P.E.
Case Manager
Bureau of Federal Case Management
New Jersey Department of Environmental Protection
401 East State Street, CN 028
Trenton, NJ 08625-0028

Re: L. E. Carpenter Site, Wharton, NJ
Work Plan for Enhanced Immiscible Product Recovery System

Dear Mr. Kaup:

The Environmental Protection Agency (EPA) has conducted a review of the above-referenced Work Plan dated January 18, 1991. I received a February 4, 1991 memorandum on this subject from Frederick J. Luckey, EPA geologist. This memorandum contains Mr. Luckey's comments on the Work Plan and also includes comments which relate to the Remedial Investigation findings. I have enclosed a copy of this memorandum for your consideration. Notwithstanding the enclosed comments, I believe that a decision on the Enhanced Immiscible Product Recovery System can be made based on the January 18, 1991 Work Plan. There will be further opportunities to address the enclosed comments in the design of the Enhanced System and/or in the work on the final remedy for the groundwater.

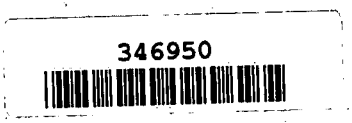
I also wish to note why some of the specific comments need not interfere with the selection of an Enhanced System.

1. The comments that relate to the specific chemicals involved in the groundwater contamination need not be addressed to select an Enhanced Immiscible Product Recovery System. The purpose of this interim action is to remove immiscible product, not specific chemicals.

2. The "masking effect" which is discussed in the memo is not necessarily a serious problem. While the high levels of xylene can raise the detection limits for other contaminants, the high concentration of xylene will identify a groundwater sample as being highly contaminated. Thus the main problem will not be masked. However, it would be useful to know the actual detection limit each time "not detected" is reported.

3. The comments that appear most relevant to selecting an Enhanced Immiscible Product Recovery System relate to the fact that the extent of the floating product has not been exactly defined and that the proposed locations for immiscible product withdrawal may not be optimal. While the recommended system

J J 2/7



may not be optimal, there is a trade-off between opting for a highly effective system and one that can be implemented expeditiously based on the available data. The report recognizes this trade-off. It seems that the option recommended in the report would result in a substantial improvement. The report also recognizes that an active recovery system (i.e., a system that enhances immiscible product recovery by lowering the water table) cannot be implemented expeditiously because of the time it would take to design, obtain approval for, and implement a system for a groundwater treatment and disposal. However, an active recovery system remains as a future option.

Please contact me at 212 264-8098 if you wish to discuss this matter.

Sincerely yours,

Jonathan Josephs, Project Manager
New Jersey Superfund Branch II
Emergency and Remedial Response Division

Enclosure

bcc: F. Luckey, PSB